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September 20, 2024

**VIA ECF**

The Honorable Ronnie Abrams  
 United States District Judge  
 Thurgood Marshall  
 United States Courthouse  
 40 Foley Square  
 New York, NY 10007

Re: ***United States v. Michael Wilbon, et al., S1 23 Cr. 52 (RA)***

Dear Judge Abrams:

We represent Mr. Michael Wilbon in the above-captioned matter. With the Government's consent, we request an 11-day adjournment of our due date for a sentencing submission on Mr. Wilbon's behalf. The letter is currently due on September 26, 2024. This is our first request for an adjournment of the submission date. This adjournment would allow us additional time to secure supporting information relevant to the sentencing.

We understand that this will affect the overall sentencing schedule, which we would now propose to be:

- Defendant's Sentencing Submission Deadline, Monday, October 7;
- Government's Sentencing Submission Deadline, Tuesday, October 15; and
- Sentencing Date, October 22 at 2pm (Chambers has alerted me that this date and time are available).

We thank the Court for its attention to this matter.

Respectfully submitted,

/s/

Michael W. Martin  
 Ian Weinstein  
 Lincoln Square Legal Services, Inc.  
*Attorneys for Mr. Michael Wilbon*

cc: All Parties via ECF

Application granted. The Court approves the revised deadlines for the parties to file their sentencing submissions. The sentencing is adjourned to October 22, 2024 at 2:00 p.m.

SO ORDERED.

  
 Ronnie Abrams, U.S.D.J.  
 September 20, 2024